

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY
Caption in Compliance with D.N.J. LBR9004-2(c)

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Attorneys for Secured Creditor,
Township of Winslow
By: CherylLynn Walters, Esquire

In Re:

**YAMSEL M. BENVENUTTI and
JAVIER BENVENUTTI,**
Debtors.

Case No: 17-35991
Chapter: 13
Judge: Hon. Andrew B. Altenburg, Jr.
Hearing Date: February 28, 2018
Hearing Type: Confirmation (Original Plan)

**OBJECTION TO CONFIRMATION
OF DEBTOR'S ORIGINAL
CHAPTER 13 PLAN**

The undersigned, PLATT & RISO, P.C., attorneys for Secured Creditor, TOWNSHIP OF WINSLOW, hereby objects to confirmation of the debtor's proposed Chapter 13 Plan filed on December 29, 2017, for the following reason(s):

- (1) The proposed Plan fails to provide for payment to the Township of Winslow for the full value of its secured claim for unpaid water and/or sewer charges levied against the real property located at 20 Edgeview Lane and known as Block 10902, Lot 3 on the Winslow Township Tax Map, as said claim is shown on the Proof of Claim filed by the Township of Winslow on January 18, 2018;
- (2) To any attempt by the Debtor to pay any amount less than the amount due the Township of Winslow as set forth on said Proof of Claim; and

(3) For failure of the proposed Plan to provide for regular quarterly water/sewer payments to the Secured Creditor outside of debtor's Chapter 13 Plan.

PLATT & RISO, P.C.
Attorneys for Secured Creditor
Township of Winslow
/s/ CHERYLynn WALTERS
CHERYLLYNN WALTERS, ESQUIRE

DATED: January 18, 2018